

**LAW OFFICE OF
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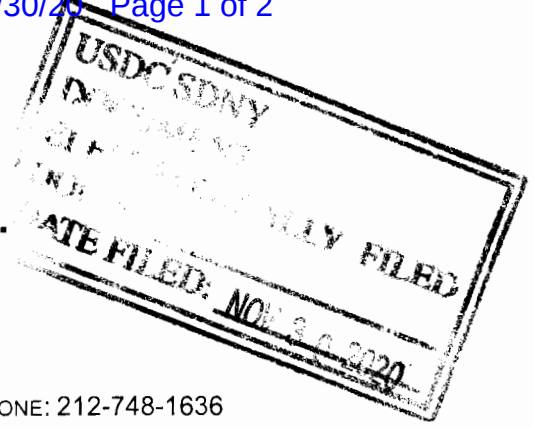
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November 30, 2020

Honorable George B. Daniels
United State District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: NOV 30 2020

Re: *United States v. Blair*,
20-CR-342 (GBD)

Dear Judge Daniels:

I write to seek a two-week extension of time to file motions on behalf of my client, Calvin Blair. The government consents to this request.

My motions are now due on December 4, 2020. The government's response is due on January 15, 2021. My reply is to be filed on January 29, 2021. The Court has set a conference for January 26, 2021. I propose filing my motions by December 18, 2020. The government's response would be due on January 29. My reply would be filed by February 12, 2021. The conference would be held anytime thereafter at the Court's convenience. I consent to the exclusion of time until the conference pursuant to 18 U.S.C. §3161(h)(7).

I ask for this additional time for a combination of reasons. First, my review of the discovery has taken longer than I anticipated. Given my other professional commitments, including the fact that I am moving my office today, it will be difficult to file my motions by December 4. The extension will permit me to review the discovery more completely and discuss my approach to the motions with Mr. Blair, who is incarcerated at the Essex County Jail, which has made in-person visits impossible. I have not previously asked for an extension of this deadline.

Respectfully submitted,

_____/s/_____
Stephanie Carvlin